

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>IN RE:</b>	)	<b>CASE NO: 16-40283-399</b>
<b>JOHN REYNOLDS</b>	)	<b>Chapter 13</b>
<b>DEBORAH REYNOLDS</b>	)	
	)	<b>Trustee's Objection to Confirmation</b>
	)	<b>Original Confirmation Hearing set for:</b>
<b>Debtors</b>	)	<b>March 9, 2016 10:00 am</b>

## TRUSTEE'S OBJECTION TO CONFIRMATION OF 1ST AMENDED PLAN

**COMES NOW** John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. The plan does not provide sufficient funds to pay all creditors entitled to full payment, including fair market value of secured claims and priority debts. 11 U.S.C. §§ 1322(a)(2) & 1325(a)(5)(B)(ii)
2. The set monthly payments to be made by the Trustee exceed the plan payment.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: March 16, 2016

OBJCONFAF--KLW

/s/ Kathy Wright  
Kathy Wright MO31047  
Attorney for Trustee  
P.O. Box 430908  
St. Louis, MO 63143  
(314) 781-8100 Fax: (314) 781-8881  
trust33@ch13stl.com

The undersigned hereby certifies that he served the above notice on this day of March 16, 2016, either through the Court's ECF system or by ordinary mail, postage pre-paid, addressed to:

/s/ Kathy Wright

JOHN REYNOLDS  
DEBORAH REYNOLDS  
1737 BRIARMANOR DR  
LAKE SAINT LOUIS, MO 63367

PONTELLO LAW LLC  
5988 MID RIVERS MALL DR  
STE 112  
ST CHARLES, MO 63304